

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HUISHAN CHEN ,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE “A”,

Defendants.

Case No.: 2:24-cv-01516

Honorable William S. Stickman

JURY TRIAL DEMANDED

**PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANTS
NOS. 2, 4, 7, 8, 10, 11, 14, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 33, 35, 39, 40, 41, 42,
43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68,
69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 AND
93**

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff Huishan Chen (“Plaintiff”) hereby requests the Clerk of the United States District Court for the Western District of Pennsylvania for Entry of Default for each of the Defendants Nos. 2, 4, 7, 8, 10, 11, 14, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 33, 35, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 and 93 (as noted in further detail in Schedule “A” attached hereto)¹ for failure to answer or otherwise respond as provided by the Federal Rules of Civil Procedure. The Declaration of Xiyan Zhang in support of this Request for Entry of Default is attached hereto.

Executed this 15th day of January, 2025

¹ Counsel for Huishan Chen notes that no answers have been filed for any of the active Defendants. All Defendants Nos. 2, 4, 7, 8, 10, 11, 14, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 33, 35, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92 and 93 are in default at the time of this filing.

/Xiyang Zhang/_____

Xiyang Zhang

Stratum Law LLC

2424 E. York St. Ste. 233

Philadelphia, PA, 19125

Phone# (215) 395-8756

Bar# 5052642

Email: xzhang@stratumlaw.com

Attorney for Plaintiff Huishan Chen